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GRB USAO 2014R00069

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF MARYLAND: 31

UNITED STATES OF AMERICA
v.
KIARA A. SKIPWITH,
Defendant

CLERK'S OFFICE
Criminal Number: RDB-14-039

BY Conspiracy to Defraud the Government with
Respect to Claims, 18 U.S.C. § 286; Aiding and
Abetting, 18 U.S.C. § 2

INFORMATION

The United States Attorney for the District of Maryland charges that:

INTRODUCTION

At all times relevant to this Information:

1. Defendant KIARA A. SKIPWITH resided in Parkville, Maryland.
2. Co-conspirator Sheila Anderson-Cloude, who resided in Nottingham, Maryland, was employed by the United States Department of Transportation.
3. Co-conspirator Tonia Patrice Lawson resided in Middle River, Maryland.
4. Co-conspirator J.T. resided in Baltimore, Maryland.
5. The Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury responsible for enforcing and administering the tax laws of the United States and collecting taxes owed to the United States. The Department of Treasury was responsible for the disbursement of payments, including tax refunds, to individuals.

COUNT ONE

(Conspiracy to Defraud the Government with Respect to Claims)

1. The factual allegations contained in Paragraphs 1 through 5 of the Introduction Section of this Information are realleged and incorporated herein as if copied verbatim.
2. From no later than in or about February 8, 2010, and continuing until at least in or about February 20, 2012, within the District of Maryland and elsewhere, Defendant

KIARA A. SKIPWITH

Sheila Anderson-Cloude, Tonia Patrice Lawson, J.T., and others, both known and unknown to the grand jury, unlawfully and knowingly agreed, combined, and conspired with others and each other to defraud the United States by obtaining and aiding to obtain the payment and allowance of false, fictitious, and fraudulent claims against an agency or department of the United States.

MANNER AND MEANS

3. **KIARA A. SKIPWITH**, Sheila Anderson-Cloude, Tonia Patrice Lawson, J.T., and others, both known and unknown to the grand jury, would and did agree to file and cause others to file false federal income tax returns.
4. **KIARA A. SKIPWITH**, Sheila Anderson-Cloude, Tonia Patrice Lawson, J.T., and others recruited individuals who had little or no earned income, had little or no withholdings paid to the IRS, and who had not regularly filed tax returns in the past (the "recruits").
5. Sheila Anderson-Cloude would and did obtain the names, dates of birth, and Social Security numbers of the recruits to use on the false tax returns. Sheila Anderson-Cloude obtained this personal identifying information in several ways. In some instances, Sheila Anderson-Cloude obtained this identifying information directly from the individual to whom the information belonged. In other instances, **KIARA A. SKIPWITH**, Tonia Patrice Lawson, J.T.,

and others obtained the personal identifying information from the recruit, which they then provided to Sheila Anderson-Cloude so that she could file a false tax return using the personal identifying information.

6. Using this personal identifying information, Sheila Anderson-Cloude would and did prepare and file false federal income tax returns which contained a variety of fictitious information, including falsely inflated income, false education expenses, and false dependent information. This false information caused the Department of Treasury to issue fraudulent tax refunds for which the recruit was not otherwise entitled.

7. On these false tax returns, Sheila Anderson-Cloude directed the fraudulent tax refunds to be deposited into bank accounts controlled by **KIARA A. SKIPWITH**, Sheila Anderson-Cloude, Tonia Patrice Lawson, J.T. and others. These accounts included xxx7291 at M&T Bank (Sheila Anderson-Cloude), xxx3009 at M&T Bank (Sheila Anderson-Cloude), xxx2736 at Wachovia Bank (Tonia Patrice Lawson), xxx0680 at Wachovia Bank (Tonia Patrice Lawson), xxx6048 at Municipal Employee Credit Union of Baltimore (“MECU”) (Tonia Patrice Lawson), xxx1530 at Wachovia Bank (Tonia Patrice Lawson), xxx2550 at MECU (J.T.), and xxx5208 at MECU (**KIARA A. SKIPWITH**).

8. The false tax refunds issued by the Department of Treasury were divided between the conspirators. In some instances, Sheila Anderson-Cloude directed all of the false tax refund to be direct deposited into a single account. After the false refund was received, the false tax refund was distributed among the participants. In other instances, Sheila Anderson-Cloude directed that the false tax refund be direct deposited into multiple accounts.

ACTS IN FURTHERANCE OF THE CONSPIRACY

9. To accomplish the objectives of the conspiracy, in the District of Maryland and elsewhere, **KIARA A. SKIPWITH** and others, both known and unknown to the grand jury, committed the following acts, among others, in furtherance of the conspiracy:

10. Sheila Anderson-Cloude prepared and filed, and caused to be prepared and filed, false federal income tax returns in the names of the following individuals known to the grand jury, whose initials are listed below, on or about the dates listed below, and claiming refunds for the amounts listed below:

Paragraph	Date of Filing	Name on Return	Refund Claimed
11.	2/13/2012	L.C.	\$4,543
12.	2/13/2012	S.S.	\$7,946

13. On or about the dates listed below, as payment for recruiting individuals to file false tax returns, **KIARA A. SKIPWITH** received portions of tax refunds from fraudulent tax returns in the amounts listed below into the MECU bank accounts ending in xxx5208:

Paragraph	Individual	Refund Claimed	Date of Deposit	Amount
14.	L.C.	\$4,543	1/30/2012	\$1,500
15.	S.S.	\$7,946	2/1/2012	\$1,800

All in violation of Title 18, United States Code, Section 286.

Date: 1/28/14

for Rod J. Rosenstein #8
ROD J. ROSENSTEIN
United States Attorney